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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION
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12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.,
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.
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Case No. 3:17-cv-00939-WHA

**DECLARATION OF TAGGART
MATTHIESEN IN SUPPORT OF NON-
PARTY LYFT, INC.'S MOTION TO
INTERVENE FOR THE LIMITED
PURPOSE OF SUPPORTING WAYMO'S
MOTION TO CLOSE COURTROOM**

Date: November 28, 2017
Time: 8:00 a.m.
Crtrm.: 8 – 19th Floor
Judge: The Hon. William H. Alsup

DECLARATION OF TAGGART MATTHIESEN

I, Taggart Matthiesen, declare and state as follows:

1. I am the Director, Product Management at Lyft, Inc. (“Lyft”), and submit this declaration in support of Lyft’s motion to intervene for the purpose of supporting Waymo LLC’s (“Waymo”) motion to close the courtroom as that motion relates to the collaboration agreement between Lyft and Waymo. The matters set forth herein are based on my personal knowledge. If called as a witness, I could and would testify competently to the matters set forth herein.

2. I have been the Director, Product Management at Lyft since July of 2015. In my capacity as Lyft’s Director, Product Management, I am in charge of developing and communicating Lyft’s product vision from its executive leadership to its development and implementation teams. Among other responsibilities, I investigate, select, and drive the development of Lyft’s products, ensuring that I clearly articulate the business value of any new products to my team so that they understand the intent behind the new product or product release, and so that we can push the strategy behind the product along with its roadmap and work with Lyft’s engineering team to build the product that Lyft has envisioned. As Lyft’s Director, Product Management, I was involved in negotiating the collaboration between Lyft and Waymo related to autonomous vehicles.

3. The Lyft-Waymo collaboration appeared in a news story that was published on May 14, 2017. When Lyft was called for comment, it confirmed the deal in a short public statement, noting only that “Waymo holds today’s best self-driving technology, and collaborating with them will accelerate [Lyft’s] shared vision of improving lives with the world’s best transportation.” I am not aware of any other public comments that Lyft or Waymo have made about the deal since that time, and the details of the Lyft-Waymo alliance, including the level of collaboration expected, remain highly confidential. That is, none of the details about the deal has been exposed publicly.

4. As set forth in my earlier declaration dated June 15, 2017, Lyft has taken steps to ensure the confidentiality of the nature of its alliance with Waymo. Lyft has done so to protect its business strategies, such as its visions for the future of Lyft and the ride-sharing industry

1 generally, from its competitors, including Uber Technologies, Inc. (“Uber”). Should the terms of
2 the Lyft-Waymo deal be exposed to members of the public or to Uber’s representatives or other
3 potential competitors, Lyft would suffer competitive harm. For instance, competitors or future
4 business partners could review the deal terms in order to “shop” terms, parrot Lyft’s business
5 strategies with little to no investment, or craft agreements to undercut Lyft’s expansion into the
6 autonomous driving space. For these reasons, Lyft has imposed measures, even internally, to
7 ensure that the deal terms remain confidential.

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9 I declare under penalty of perjury under the laws of the State of California that the
10 foregoing is true and correct. Executed on October 16, 2017, at San Francisco, California.

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14 Taggart Matthiesen
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